

Presentment Date and Time: April 3, 2017 at 10:00 a.m.
Objection Deadline: March 30, 2017 at 4:00 p.m.

ROPES & GRAY LLP
Gregg M. Galardi
D. Ross Martin
Joshua Y. Sturm
Jonathan M. Agudelo
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090

*Counsel to the Plan Administrator
for the Debtors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
:
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
:
Debtors. : (Jointly Administered)
:
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**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER
BETWEEN THE DEBTORS AND STARCOM WORLDWIDE, INC.
AND ITS AFFILIATED AGENCIES REGARDING PROOFS OF CLAIM**

PLEASE TAKE NOTICE that Starcom Worldwide, Inc., and its affiliated agencies in the media advertising and related business (collectively, “Publicis”) filed proofs of claim nos. 307, 309, and 310 (collectively, the “Proofs of Claim”) against each of Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. (collectively, the “Debtors”);

PLEASE TAKE FURTHER NOTICE that Publicis alleges certain setoff and recoupment rights in each Proof of Claim;

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that following good-faith, arm's-length negotiations between the Debtors and Publicis, the parties entered into the stipulation and order attached hereto as **Exhibit A** in respect of the Proofs of Claim (the "**Stipulation and Order**");

PLEASE TAKE FURTHER NOTICE that, absent objections, the undersigned will present the Stipulation and Order for signature to the Court on **April 3, 2017 at 10:00 a.m.**; and

PLEASE TAKE FURTHER NOTICE that responses or objections to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **March 30, 2017 at 4:00 p.m.** (prevailing Eastern Time) (the "**Objection Deadline**"), upon (i) the Plan Administrator for the Debtors, Attn. William D. Holden (profinvoices@gawker.com); (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel for Publicis, Locke Lord LLP, 111 South Wacker Drive, Suite 4100, Chicago, IL 60606, Attn: Jonathan W.

Young; and (v) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

Dated: March 20, 2017
New York, New York

/s/ Gregg M. Galardi
ROPES & GRAY LLP
Gregg M. Galardi
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1211 Avenue of the Americas
New York, NY 10036-8704
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joshua.sturm@ropesgray.com
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